



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

OCT 09 2015

Ref: 8ENF-UFO

CERTIFIED MAIL 7009-3410-0000-2600-8602
RETURN RECEIPT REQUESTED

Laura Bacon
FX Drilling Company
P.O. Box 449
Shelby, Montana 59474-0449

Re: Underground Injection Control (UIC)
Notice of Violation:
Loss of Mechanical Integrity
90-W6 Well
EPA Permit ID # MT20000-01103
API # 25-035-05111
Cut Bank Oil Field
Glacier County, Montana

Dear Ms. Bacon:

On September 23, 2015, the Environmental Protection Agency (EPA) observed a mechanical integrity test (MIT) at the FX Drilling Company injection well referenced above. The EPA observed air bubbles coming out of the well head and a rapid decline in annulus pressure, indicating a loss of mechanical integrity. Pursuant to Title 40 of the Code of Federal Regulations Section 144.28(f)(2) (40 C.F.R. § 144.28(f)(2)), you must establish and maintain mechanical integrity. A loss of mechanical integrity is a violation of this requirement.

Because this well is currently Temporarily Abandoned, pursuant to 40 C.F.R. § 144.28(f)(3), you may not resume injection into this well. Before injection may resume, you must demonstrate that the well has mechanical integrity by passing a mechanical integrity test (MIT). You must also receive written authorization from the EPA.


Within thirty (30) days of receipt of this letter, please submit a letter describing what action you intend to take regarding the well, including a time frame in which you anticipate the work to be completed. It is expected that you will return this well to compliance within ninety (90) days of the loss of mechanical integrity.

If you choose to plug and abandon this well, a plugging and abandonment plan must be submitted to the EPA for approval prior to the plugging operation.

Failure to comply with UIC regulations found at 40 C.F.R. Parts 144 and 146 constitutes one or more violations of the Safe Drinking Water Act, 42 U.S.C. § 300h. Such non-compliance may subject you to formal enforcement by the EPA, as codified at 40 C.F.R. Part 22.

If you have any questions concerning this letter, you may contact Gary Wang at (303) 312-6469. Please direct all correspondence to the attention of Gary Wang at Mail Code 8ENF-UFO.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Arturo Palomares', is written over a large, horizontal oval shape.

for Arturo Palomares, Director
Water Technical Enforcement Program
Office of Enforcement, Compliance
and Environmental Justice

cc: The Honorable Harry Barnes, Chairman, Blackfeet Tribe
Gerald Wagner, Environmental Director, Blackfeet Tribe